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From: Corbett, Kate (DPH)
Sent: Tuesday, March 09, 2010 6:52 AM
To: Flanagan, Thomas (PLY)
Cc: Khan, Annie (DPH)
Subject: RE: 4/8/10 trial: Comm. v. [REDACTED]
Attachments: std court questions.doc; gc-ms court questions.doc

Hi Tom,

I copied Annie on this email...she is listed in the state email system under her maiden name. We will get a discovery packet out to you this week. I have also attached some predicate questions that we have been using. You can reach us in the lab at 617-983-6632 or 617-983-6631

Thanks,
Kate

From: Flanagan, Thomas (PLY)
Sent: Monday, March 08, 2010 2:17 PM
To: Corbett, Kate (DPH)
Subject: 4/8/10 trial: Comm. v. [REDACTED]

Kate,
This is sent as a heads-up that you will be receiving a summons for the above-referenced trial later this week. the 2 lab numbers for this case are [REDACTED] (the cert states the latter was not tested). The cert for [REDACTED] states that "Annie Dookhan" was also an analyst on the case--she wasn't on the state email system--has she left the lab? If so, were you involved throughout the testing of this item?

I would appreciate your help in doing the following things at your earliest opportunity--

for discovery compliance, please send me a copy of the lab case file for this matter, including your notes and any chain of custody documents; please also fax or email me a copy of your CV, along with any predicate/ expert foundation questions you prefer to have used.

You can fax documents to me at fax # 508 586-3578; by mail, the address is Plymouth County DA's Office, 32 Belmont St., Brockton, 02301; you can reach me at direct tel. # 508 894-2508.

For your convenience, I can keep you on call for the morning of trial, if you can give me your cell # so we can reach out to you as needed--I will likely not need to call you as a witness until the afternoon of 4/8.

Please touch base with me in response to this--we can review your testimony by telephone prior to 4/8 at a mutually convenient time--I look forward to speaking with you.

Thanks,
A.D.A. Tom Flanagan